RSPA-99-4957-17

PAPERWORK REDUCTION ACT SUBMISSION

Please read the Instruction before completing the form. For additional forms or assistance in completing this form, contact your agency's Paperwork Clearance Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting statement, and any additional documention to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 17th Street NW Washington DC 20503.

1. Agency/Subagency originating request
U.S. DOT RSPA

2. OMB Control Number
a. 2137-0579
b. ☐ None

3. Type of information collection *(check one/*
a. ☐ New collection
b. ☐ Revision of a currently approved collection
c. ☒ Extension of a currently approved collection
d. ☐ Reinstatement, without change, of a previously approved collection for which approval has expired
e. ☐ Reinstatement, with change, of a previously approved collection for which approval has expired
f. ☐ Existing collection in use without an OMB control number
for b-f, note Item A2 of Supporting Statement instructions

4. Type of review requested *(check one)*
a. ☒ Regular
b. ☐ Emergency - Approval requested by: ___/___/___
c. ☐ Delegated

5. Small entities
Will this information collection have a significant economic impact on a substantial number of small entities? ☐ Yes ☒ No

6. Requested expiration date
a. ☒ Three years from approval date b. ☐ Other Specify: ___/___

7. Title
Management Information System Standardized Data Collection and Reporting ~~Drug Testing~~

8. Agency from number(s) *(if applicable)*

9. Keywords
pipeline safety, drug abuse, drug testing

10. Abstract
Gas and Hazardous Liquid operators are required to prepare an annual drug test which includes a report on the results of the operaotrs anti-drug program.

11. Affected public *(Mark primary with "P" and all others that apply with "X")*
a. ☐ Individuals or households
b. ☒ Business or other-for-profit
c. ☐ Not-for-profit institutions
d. ☐ Farms
e. ☐ Federal Government
f. ☐ State, Local or Tribal Government

12. Obligation to respond *(Mark Primary with "P" and all others that apply with "X")*
a. ☐ Voluntary
b. ☐ Required to obtain or retain benefits
c. ☒ Mandatory

13. Annual Recordkeeping and reporting burden
a. Number of respondents 2,419
b. Total annual responses 1,719
1. Percentage of these responses collected electronically 33 %
c. Total annual hours requested 8,264
d. Current OMB inventory 12,809
e. Difference (+/-) -3,545
f. Explanation of difference -3,545
1. Program change (+/-)
2. Adjustment (+/-)

14. Annual reporting and recordkeeping cost burden *(in thousands of dollars)*
a. Total annualized captial/startup costs 0
b. Total annual cost (O&M)
c. Total annualized cost requested
d. Current OMB inventory
e. Difference
f. Explanation of difference
1. Program change
2. Adjustment

15. Purpose of information collection *[Mark primary with "P" and all others that apply with "X"]*
a. ☐ Application of benefits
b. ☒ Program evaluation
c. ☐ General purpose statistics
d. ☐ Audit
e. ☐ Program planning or management
f. ☐ Research
g. ☒ Regulatory compliance

16. Frequency of recordkeeping or reporting *(check all that apply)*
a. ☒ Recordkeeping
b. ☐ Third party discussions
c. ☐ Reporting
1. ☐ On occassion
2. ☐ Weekly
3. ☐ Monthly
4. ☐ Quarterly
5. ☐ Semi-annually
6. ☐ Annually
7. ☐ Biennially
8. ☐ Other (describe)

17. Statistical methods
Does this information collection employ statistical methods?
☐ Yes ☒ No

18. Agency contact *(person who can best answer questions regarding the content of this submission)*
Name: Marvin Fell
Phone: 202 3666205

19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal agency, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.0.

NOTE:: The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320.8 (b) (3), appear at the end of the instructions. ***The certification is to be made with reference to those regulatory provisions as set forth in the instructions.***

The following is a summary of the topics, regarding the proposed collection of information, that the certification covers:

(a) it is necessary for the proper performance of agency functions;

(b) It avoids unnecessary duplication;

(c) It reduces burden on small entities;

(d) It uses plain, coherent, and unambiguous terminology that is understandable to repondents;

(e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;

(f) It indicates the retention periods for recorkeeping requirements;

(g) It informs respondents of the information called for under 5 CFR 1320.8 (b) (3):

(i) Why the information is being collected;

(ii) Use of information:

(iii) Burden estimate;

(iv) Nature of response (voluntary, required for a benefit, or mandatory;

(v) Nature and extent of confidentiality: and

(vi(Need to display currently valid OMB control number:

(h) It was developed by an office that has planned an allocated resources for the efficient and effective management and use of the information to be collected (see note in Item 19 of the instructions);

(i) It uses effective and efficient statistical survey methodology; and

(j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in Item 18 of the Supporting Statement.

Signature of Senior Official or designee	Date

Supporting Statement
Management Information System (MIS) Standardized Data Collection and Reporting of Drug Testing Materials

A. Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

Drug abuse is a major societal problem, and it is reasonable to assume that the problem exists in the pipeline industry as t does in society as a whole. Because of the potential harmful effect of drug abuse on safe pipeline operations, warrants imposing comprehensive drug testing regulations on the pipeline industry. These rules (49 CFR 199) require annual information collection of the results of the drug testing program.

2. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The Research and Special Programs Administration (RSPA), and cooperating state agencies use the information to monitor the results of the pipeline drug testing program for each pipeline operator. If this collection of information were not conducted, the results of pipeline company anti-drug programs could not be evaluated.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decisions for adopting this means of collection. Also describe any consideration of using information technology to reduce the burden.

OPS sends a computer disk to operators to report on drug testing. One-third of operators report drug testing results by sending back the computer disk.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use purposes described in Item 2 above.**

There is no duplication. There is no similar information available.

5. **If the collection of information impacts small businesses or other small entities, describe the methods used to minimize burden.**

The drug testing regulations (Part 199) exempt operators of master meter systems, which are the smallest operators, from the drug testing program. Other small operators while required to collect test information, need not send it to Federal Government unless requested specifically by the Administrator of RSPA. Large operators however, are required to send reports on an annual basis.

6. **Describe the consequence to Federal program or policy activities if the collection were conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Any reduction in the frequency would provide RSPA with less timely information. Potential problems would go unheeded for a longer time posing a safety risk to the public. There are no other obstacles to reducing the burden.

7. **Explain and circumstances that require the collection to be conducted in a manner:**

requiring respondents to report information to the agency more than quarterly;

requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

requiring respondentsto submit more than an original and two copies of any document;

requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

requiring the use of a statistical data classification that has not be reviewed and approved by OMB;

that includes a pledge of confidentiality that is not supported by authority established in statue or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to extent permitted by law.

This information collection has no special circumstances described in the above list.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in the response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be reported.

The request to extend the information collection was published in the Federal Register on October 22, 1999 (64 FR 57183). No comments were received.

9. **Explain any decision to provide any payment for gift to respondent, respondents other than remuneration of contractors or grantee.**

There is no remuneration provided.

10. **Describe the assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation or agency policy.**

The information collected in the annual pipeline drug program information system report will not intrude on the legitimate privacy rights of an individual other than in statistical form.

11. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

Apart from drug test and rehabilitation records that are name-specific, the information collection regulations do not involve questions of a sensitive nature.

12. **Provide estimates of the hour burden of the collection of information.**

The estimated burden to industry is outlined below:

There are approximately:

775 Transmission operators
225 Liquid pipeline operators
706 Small distribution operators
673 Medium and Large distribution operators
2,419 Total Operators

Small operators estimated to be 706 operators do not have to send reports annually and therefore are excluded from the reporting burden estimates but not the reporting estimates.

Average reporting time per operator is 2 hours Xl ,713 operators = 3,426 hours
Average recordkeeping per operator is 2 hours X 2,419 operators = 4,838 hours
Total information burden on industry is 8,264 hours

The total annual cost to industry is 8,264 X $25 per hour = $181,600.

13. **Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection information.**

There are no additional costs beyond the paper work expenses.

14. **Provide estimates of the annualized cost to the Federal Government.**

The estimated annual cost of the pipeline drug program management information system to the Federal Government is outlined below. There are 1,713 reports

Validation of reports at 30 minutes each	856 hours
Re-verification of 20% of reports at 30 minutes each	171 hours
Input reports into data bank at 10 minutes each	285 hours
Analysis of data	75 hours
Total government burden hours	1387 hours

Total Federal Government cost = 1,387 hours X $25 per hour = $34,675.

15. **Explain reasons for changes in burden, including the need for any increase.**

There is a reduction in the burden from 12,809 to 8,264 for a reduction of 3,545 hours. The reduction was estimated do to the use of computerized reporting and recordkeeping.

16. **For the collection of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis, and publication.**

The only statistical use of this information is that if operators rates showed employee drug use to be less than 1% and has as a result reduced the percent of employees that are required to be randomly tested.

17. **If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

RSPA is not seeking approval to not display expiration date.

18. **Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-1.**

There are no exceptions.